

KAPLAN HECKER & FINK LLP

350 FIFTH AVENUE | 63RD FLOOR
NEW YORK, NEW YORK 10118

1050 K STREET NW | SUITE 1040
WASHINGTON, DC 20001

TEL (212) 763-0883 | FAX (212) 564-0883

WWW.KAPLANHECKER.COM

DIRECT DIAL 212-763-0883

DIRECT EMAIL shecker@kaplanhecker.com

June 17, 2022

By ECF

The Honorable John G. Koeltl
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: *Roche Cyrulnik Freedman LLP v. Cyrulnik*, No. 1:21-cv-01746 (S.D.N.Y.)

Dear Judges Koeltl and Netburn:

We represent Plaintiff Roche Freedman LLP (“RF”) in this matter and write pursuant to Rule 6.A.2 of the Court’s Individual Practices to request permission to file an exhibit to RF’s upcoming letter application on non-document related discovery issues to Judge Netburn under temporary seal (as well as any language referencing the exhibit).

RF does not believe these discovery materials need to be public at this time. RF believes Cyrulnik would have an interest in keeping the materials under seal, and so makes this application in the interest of affording Cyrulnik the opportunity to file a motion for longer-term sealing, which RF will not oppose.

In accordance with Rule 6.A.2 of your Honor’s Individual Practices, we have notified Cyrulnik of his obligation to file a letter within three days explaining the need to seal the materials. We have also advised him that we will not oppose that request.

We thank the Court for its consideration of this request.

Respectfully,



Sean Hecker

cc: Counsel of Record (via ECF)